

**HARRIS**  
**ST. LAURENT**

August 28, 2020

**BY ECF**

Hon. Alvin K. Hellerstein  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: United States v. David Wagner, et. al., 19-cr-437 (AKH)

Dear Judge Hellerstein:


My firm represents defendant Marc Lawrence in this matter.

Pursuant to this Court's Order dated August 14, 2020 (Docket No. 76), I write to update the Court regarding Mr. Lawrence's continued efforts to search for a third financially responsible person to co-sign his personal recognizance bond.

Since our last update to the Court on August 14, 2020, the financially responsible individual with whom Mr. Lawrence was speaking declined to co-sign Mr. Lawrence's bond. This developed just yesterday. Mr. Lawrence continues to use his best efforts to secure a third co-signer.

We have discussed Mr. Lawrence's efforts with the Government (AUSA Jilan Kamal and AUSA Sagar Ravi), and they have no objection to an additional two-week extension for Mr. Lawrence to continue his search. Accordingly, we ask the Court to allow Mr. Lawrence to remain at liberty with two co-signers pending the results of his continued search for another financially responsible person. We will update the Court regarding Mr. Lawrence's continued efforts no later than later than September 11.

Respectfully,



Andrew St. Laurent

cc: AUSA Jilan Kamal, Esq. (by ECF)  
AUSA Sagar Ravi, Esq. (by ECF)